

October 24, 2005

Stephanie Mizuno
Assistant City Clerk, City of Sacramento
Historic City Hall, First Floor
[Address Redacted]
Sacramento, CA 95814

**Re: Your Request for Informal Assistance
Our File No. I-05-200**

Dear Ms. Mizuno:

This letter is in response to your request for advice regarding the campaign provisions of the Political Reform Act (the “Act”).¹ Because your questions are general in nature, we are treating your request as one for informal assistance.²

The City of Sacramento is holding a June 6, 2006, election. The city’s rules require candidates and committees to file a post-election statement no later than July 5, 2006. The period covered by the city’s post-election statement is May 21, 2006 through June 30, 2006, which is the same period covered by the semi-annual statement required by the Act. The semi-annual statement is due no later than July 31, 2006. You requested approval to combine the city’s post-election statement and the semi-annual statement so that candidates and committees are not required to file two statements covering the same period.

Nothing in the Act prohibits a local jurisdiction from adopting its own rules imposing additional requirements provided those rules do not conflict with the Act. (Section 81013.) In addition, a local jurisdiction may enact its own campaign reporting rules as long as those rules are imposed only on candidates and committees active in the jurisdiction and do not prevent those candidates and committees from complying with the Act’s reporting requirements. (Section 81009.5.) According to regulation 18426, whenever a person is required to file a semi-annual campaign statement, that person may file at any time prior to the date as long as all

¹ Government Code sections 81000 – 91014. Commission regulations appear at Title 2, sections 18109-18997, of the California Code of Regulations.

² Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; regulation 18329(c)(3).)

expenditures made and contributions received are included. Since the city's post-election statement is due prior to the semi-annual statement filing deadline, the semi-annual statement filing requirement is also satisfied. (Section 84200.) Therefore, the semi-annual filing requirement will be met by the statement required to be filed under the city's rules by July 5, 2006. However, please note that the deadline imposed by the Act for filing the semi-annual statement remains in effect. Therefore, a later filing would not violate the Act's filing deadline if accomplished by July 31, 2006.

If you have further questions regarding this matter, please contact me at (916) 322-5660.

Sincerely,

Luisa Menchaca
General Counsel

By: Tara L. Stock
Political Reform Consultant
Technical Assistance Division

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